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Attorneys for Plaintiff
5 United States of America

6
7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 **UNITED STATES OF AMERICA,**

10 Plaintiff,

11 v.

12 **SALEUMKIAT KAYARATH,**

13 Defendant.
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Case Nos. 2:14-cr-0353-GMN-GWF
2:15-cr-0305-KJD-NJK

**UNOPPOSED MOTION TO
CONSOLIDATE**

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16 COMES NOW THE UNITED STATES OF AMERICA, by and through DANIEL
17 G. BOGDEN, United States Attorney, and Susan Cushman, Assistant United
18 States Attorney, and hereby moves this Court for an order to consolidate this case
19 with *United States v. Saleumkiat L. Kayarath*, case number 2:15-cr-0305-KJD-NJK
20 for all further proceedings.
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22 On October 29, 2014, a federal grand jury in the District of Nevada returned a
23 nine-count criminal indictment charging Saleumkiat KAYARATH, Ardis Vanfossan,
24 Chayphet Voravong, and John Tacorda with Conspiracy to Distribute a Controlled
25 Substance in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)(viii) and related
26 offenses. The case was assigned to Chief Judge Gloria M. Navarro.
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1 On July 18, 2013, a federal grand jury in the District of Vermont returned a
2 sealed two-count indictment charging KAYARATH with Conspiracy to Distribute a
3 Controlled Substance in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C). That
4 has since been unsealed and the case has been transferred to the District of Nevada
5 under Rule 20 and assigned Case No. 2:15-cr-305-KJD-NJK.
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7 KAYARATH has entered into written plea agreements with the United States in
8 both cases. A change of plea in Case No. 2:14-cr-0353-GMN-GWF is scheduled for
9 November 23, 2015 at 1:30 p.m.. In the interest of judicial economy, the United
10 States respectfully requests this Court to order that this case be consolidated with
11 Case No. 5:13-cr-104. KAYARATH is prepared to enter a guilty plea in Case No.
12 2:15-cr-305-KJD-NJK and would like to do so on November 23, 2015. The conduct
13 in both cases is related.
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1 Richard Schonfeld, Esq., counsel for defendant, was contacted by undersigned
2 counsel and agrees with the proposed consolidation of the cases.
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4 Dated this 3rd day of November, 2015

5 Respectfully Submitted,

6 DANIEL G. BOGDEN
7 United States Attorney

8 /s/Susan Cushman

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10 SUSAN CUSHMAN
Assistant United States Attorney

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16 SO ORDERED

17 Dated: November 3, 2015

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20 GLORIA M. NAVARRO
21 Chief Judge United States District Court
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing motion was served on counsel of record
by email.

/s/ Susan Cushman

SUSAN CUSHMAN, AUSA